

Joint Status Report Pursuant to Rule 26(f)

Caption: Deanna Pierce v. City of Philadelphia Civil Action No: 17-5539

Basis of Jurisdiction: Federal Question

Jury Trial: X Non-Jury Trial: _____ Arbitration: _____

Plaintiff's counsel participating in the Rule 16 Conference: **Lane J. Schiff, Esquire**

Defendants counsel participating in the Rule 16 Conference: **Kia Ghee, Esquire**

Do counsel have full authority to settle at Rule 16 Conference? **Yes**

If not, client with such authority who will attend conference:

When did the parties hold the Rule 26 Conference? **April 26, 2018**

When did the parties comply with the Rule 26(a)'s duty of self-executing disclosure? **May 10, 2018**

Does either side expect to file a case-dispositive motion? Yes (yes/no)

If yes, under what Rule **56**

If yes, specify the issue

Proposed deadline for filing dispositive motions: **4 weeks after fact discovery**

Does either side anticipate the use of experts? **Yes**

If yes, what is the proposed deadline for expert discovery? **30 days after fact discovery.**

Approximate date case should be trial-ready: **90 days after close of fact discovery**

Time for Plaintiff's case: **2-3 days** Time for Defendant's case: **1-2 days**

Is a settlement conference likely to be helpful? _____ If so, when:

Early _____ (yes/no) After Discovery X (yes/no)

Do the parties wish to proceed before a Magistrate Judge for final disposition? **No**

Plan for Discovery:

1. The parties anticipate that discovery should be completed within 120 days.
2. What is the minimum amount of time necessary to complete discovery prior to an ADR session, should one be ordered or agreed to? **After discovery**
3. Have the parties discussed issues relating to claims of privilege or of protection as trial-preparation material, as required by Rule 26(f)(3)(D)? **No**
4. Identify any other discovery issues which should be addressed at the Rule 16 Conference, including limitations on discovery, protective Orders needed, or other elements which should be included in a particularized discovery plan. **Plaintiff may need to take more than 10 depositions**
5. If you contend the discovery period to exceed 90 days, please state reason:

Medical reasons for Defendant's attorney and number of witnesses.
